

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INDEPENDENT ASSET MANAGEMENT)	Case No. 1:07-cv-06431-JSR
LLC,)	
)	ECF
Plaintiff,)	
)	
vs.)	
)	
DANIEL ZANGER,)	
)	
Defendant.)	
)	
)	
)	
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NOTICE OF DEPOSITION OF INDEPENDENT ASSET MANAGEMENT, LLC

PLEASE TAKE NOTICE, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, that on February 18, 2008, beginning at 9:30 A.M. Eastern time, at the offices of JONES DAY, 222 E. 41st Street, New York, NY 10017, or such other earlier date and time as may be agreed to by all counsel, Daniel Zanger ("Zanger") will take the testimony of INDEPENDENT ASSET MANAGEMENT, LLC ("IAM").

The deposition will be taken before an officer authorized to administer oaths and will be recorded by stenographic means. The deposition will continue until completed with such adjournments as may be necessary.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, notice is given that IAM is to designate to testify the trustees, officers, administrators, agents or other persons affiliated with IAM with the most knowledge concerning each of the following matters for the time period commencing on the date of inception of IFL, and continuing up and through the

present. IAM shall also designate the matters on which each such person will testify and the respective time periods, where applicable:

1. Any and all communications, including but not limited to agreements, contracts and understandings, between IAM and the Prime Broker, especially but not limited to all communications in November and December of 2006.
2. Any and all communications between IAM and the Fund Administrator.
3. Any and all communications between IAM and Zanger.
4. Any and all communications between IAM and Holmstrom.
5. Any and all communications between IAM and Interactive, including but not limited to any and all communications regarding the \$300,000 investment set up in Interactive sub-accounts of IFL.
6. Any and all communications between IAM and the BMA.
7. Any and all communications between and among IAM internal staff.
8. Any and all communications between and among IFL internal staff.
9. Any and all communications authored by or regarding the IFL Board of Directors.
10. Any and all communications authored by or regarding Szele and Porco in connection with their roles as Managing Directors of IAM, from 2004-06.
11. All margin calls, day trading calls, and Zanger's covering of margin calls.
12. The current legal status of IFL.
13. All deposits to IFL and redemptions from IFL.
14. All reviews, audits, and communications of Deloitte in connection with its audits of IFL.
15. All marketing efforts by or for IAM in connection with IFL.

16. All marketing expenditures of IAM in connection with IFL.
17. All payments and fees made from IFL to IAM.
18. The retainer of 5% in calculating Zanger's redemption amount and the timing of this retainer.
19. The Fund Administrator's periodic interim, and final, NAV calculations for the Class Z shares of IFL.
20. The payment of \$50,000 from Zanger to IAM, the subsequent transfer of these funds to RCA, and efforts by IAM to recover this sum.
21. Victory Lane.
22. IAM's exploration of a new prime brokerage agreement.
23. IAM's reaction to trading freeze instituted by Prime Broker.
24. All documents allegedly supporting or relied upon by IAM in connection with the allegations set forth in the Amended Complaint.
25. All documents allegedly supporting or reflecting the calculation of alleged damages set forth in the Amended Complaint.

The deposition(s) will continue from day to day until concluded.

Dated: New York, New York
January 3, 2008

Respectfully submitted,

s/ Matthew E. Szwajkowski

Thomas H. Sear (TS-5570)

Matthew E. Szwajkowski (MS-8362)

JONES DAY

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Attorneys for Daniel Zanger

CERTIFICATE OF SERVICE

The foregoing document was served on the following counsel of record on January 3, 2008 via the method listed below:

E-Mail and UPS

John Balestriere
Craig Stuart Lanza
Balestriere PLLC
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New York, NY 10007
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s/ Matthew E. Szwajkowski
